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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ENZO ZELOCCHI, an individual, Plaintiff, }
vs. }
ADAM IZA, an individual; **IRIS AU**, }
an individual; **RICHARD DUDGEON**, an individual; **DEAN BRYAN RAWLINGS**, an individual; }
CHRISTOPHER QUINTERO, an individual; **MICHAEL QUINTERO**, }
an individual; **TROY WOODY JR.**, }
an individual; **KATY DIANN WOODY**, an individual; **THOMAS CORNELIA**, an individual; }
CORNELIA MEDIA, LLC., a Nevada corporation; **KENNETH CHILDS**, an individual; }
PARAMOUNT INVESTIGATIVE SERVICES, a California corporation; }
and **DOES 1-10**, INCLUSIVE }
Defendants }

Case No.: 2:24-cv-09601-SRM-JPR

PLAINTIFF ENZO ZELOCCHI'S CASE MANAGEMENT STATEMENT

Judge: Hon. Serena R. Murillo

Counsel for Plaintiff ENZO ZELOCCHI presents the Court with the following statement:

1 **A. Date of Filing**

2 The complaint was filed on November 6, 2024 by Plaintiff ENZO
3 ZELOCCHI, at the time proceeding in pro per.

4 **B. Parties**

5 Plaintiff ENZO ZELOCCHI (“ZELOCCHI”) is an individual and a
6 California resident. As part of his business activities, ZELOCCHI maintains
7 significant cryptocurrency assets stored on his personal laptop, which became a
8 central target of the defendants’ alleged criminal activities. The defendants’
9 actions, including their attempts to acquire ZELOCCHI’s laptop, were aimed at
10 gaining access to these assets.

11 Defendant ADAM IZA (formerly known as AHMED FAIQ aka ADAM
12 FAIQ) is an individual and a California resident and, on information and belief,
13 orchestrated a scheme involving extortion, robbery, assault, kidnapping, and
14 defamation to acquire ZELOCCHI’s cryptocurrency. IZA’s actions include
15 directing multiple extortion attempts, coordinating criminal activities, including the
16 kidnapping of ZELOCCHI in Corona, California, and being involved in physical
17 assaults and battery of ZELOCCHI and those acting as his agent; Defendant IRIS
18 AU, is an individual and a California resident and the girlfriend of Defendant
19 ADAM IZA. On information and belief, AU allegedly participated in IZA’s
20 fraudulent and extortionate efforts by filing a frivolous lawsuit and financially
21 supporting illegal activities. Evidence presented in other lawsuits suggests her
22 deeper involvement;

23 Defendant RICHARD RAYMOND DUDGEON is an individual and a
24 former Los Angeles Deputy Sheriff residing in California. On information and
25 belief, DUDGEON used his knowledge and experience as a former law
26 enforcement officer to assist IZA in criminal activities that were part of an extortion

1 scheme. This included coordinating with other defendants in the kidnapping and
2 armed robbery of ZELOCCHI, providing tactical support to facilitate the execution
3 of these crimes, and leveraging his former position to help IZA evade detection and
4 arrest;

5 Defendant DEAN BRYAN RAWLINGS is an individual and an active Los
6 Angeles County Sheriff's Deputy residing in California. On information and belief,
7 RAWLINGS used his knowledge, experience, and resources as a Sheriff's Deputy
8 to assist IZA in criminal activities that were part of an extortion scheme, including
9 planning and coordinating an armed robbery and kidnapping of ZELOCCHI at an
10 Arco gas station. RAWLINGS is also alleged to have helped IZA evade arrest by
11 using his connections and familiarity with law enforcement procedures,
12 constituting obstruction of justice;

13 Defendant CHRISTOPHER QUINTERO, an individual and a California
14 resident, is believed to be an active Los Angeles Deputy Sheriff. On information and belief,
15 C. QUINTERO used law enforcement resources to provide IZA with
16 confidential information, violating department policies;

17 Defendant MICHAEL QUINTERO is an individual and a California
18 resident, and the brother of Defendant C. QUINTERO. On information and belief,
19 M. QUINTERO participated in the robbery of non-party DAVID DO's personal
20 belongings, forcibly taking DO's laptop bag as part of the larger extortion
21 campaign targeting ZELOCCHI;

22 Defendant TROY WOODY JR. is an individual and a resident of California,
23 currently incarcerated in the Philippines. On information and belief, T. WOODY
24 directed extortion attempts targeting ZELOCCHI from abroad, including using
25 electronic means to make threats and demands for cryptocurrency. T. WOODY is
26 further alleged to have coordinated these efforts with IZA and other co-defendants,

1 actively supporting the extortion scheme despite his physical absence from the
2 U.S.;

3 Defendant KATY WOODY is an individual and a resident of Virginia, and
4 the mother of Defendant T. WOODY. On information and belief, K. WOODY
5 financially supported her son's extortion efforts and those of IZA, including
6 funding resources used to carry out the extortion scheme against ZELOCCHI in
7 California. K. WOODY is further alleged to have played a supportive role in
8 maintaining communication and financial stability for the ongoing criminal
9 activities, including sending emails and corresponding with IZA while he was in
10 California, as part of a coordinated effort to target ZELOCCHI;

11 Defendant SPENCER THOMAS CORNELIA is an individual and a Nevada
12 resident, and the owner of CORNELIA MEDIA. On information and belief,
13 CORNELIA collaborated with IZA to defame ZELOCCHI through the publication
14 of false and damaging online content. CORNELIA is alleged to have used his
15 media company, CORNELIA MEDIA, to disseminate defamatory statements as
16 part of the broader extortion scheme, causing reputational harm to ZELOCCHI;

17 Defendant CORNELIA MEDIA, LLC. is a Nevada corporation owned by
18 Defendant CORNELIA that, on information and belief, published defamatory
19 content online that damaged ZELOCCHI's professional reputation. CORNELIA
20 MEDIA was a key tool used by CORNELIA and IZA to harm ZELOCCHI's
21 reputation as part of the extortion scheme, intentionally publishing false statements
22 to further the co-conspirators' objectives;

23 Defendant KENNETH CHILDS is an individual and a California resident,
24 and the manager of PARAMOUNT. On information and belief, CHILDS
25 conducted illegal surveillance on behalf of IZA to assist in the extortion and
26 harassment of ZELOCCHI. CHILDS is further alleged to have used investigative

1 resources to track ZELOCCHI's whereabouts and movements, relaying this
2 information to the co-conspirators to aid in their criminal efforts; and

3 Defendant PARAMOUNT INVESTIGATIVE SERVICES is a California
4 corporation with its primary place of business at 633 W. Fifth Street, Los Angeles,
5 California, owned by Defendant CHILDS that, on information and belief,
6 participated in illegal surveillance of ZELOCCHI in furtherance of the extortion
7 and defamation scheme. PARAMOUNT was utilized by CHILDS and the co-
8 defendants to gather private information about ZELOCCHI to be used in
9 furtherance of their criminal activities.

10 **C. Summary of Claims**

11 This lawsuit arises from a series of coordinated criminal and unlawful acts by
12 the Defendants aimed at unlawfully acquiring ZELOCCHI's cryptocurrency,
13 intimidating ZELOCCHI, and engaging in other unlawful acts. The enterprise
14 engaged in racketeering activities including extortion, fraud, robbery, kidnapping,
15 criminal copyright infringement, obstruction of justice, defamation, and violations
16 of the Computer Fraud and Abuse Act (CFAA). These activities caused substantial
17 harm to ZELOCCHI, including financial losses, damage to his reputations,
18 emotional distress, and physical harm.

19 **D. Events Underlying the Action**

20 In 2018 Defendants began their efforts to acquire Plaintiff's cryptocurrency
21 assets. Defendants earliest attempts to acquire the cryptocurrency assets were
22 through the use of threats under the UGNAZI terrorist group identity. In 2021
23 Defendants IZA and WOODY hired Defendant CHILDS to surveil Plaintiff,
24 tracking his activity in an effort to plan attacks against Plaintiff. Defendants carried
25 out several attacks on Plaintiff, including an attempted kidnapping at a gas station
26 in Corona, CA and including an invasion of Plaintiff's home. Defendants also

1 carried out several attacks on a business associate of Plaintiff in an effort to gain
2 access to Plaintiff's cryptocurrency assets. As a part of their extortion efforts
3 against Plaintiff, Defendants filed several baseless lawsuits against Plaintiff.
4 Defendants additionally engaged in a defamatory campaign against Plaintiff, hiring
5 Defendant CORNELIA to carry out the defamation efforts as a means to extort
6 Plaintiff's cryptocurrency assets.

7 **E. Relief Sought**

8 Plaintiff seeks compensatory damages, treble damages under 18 U.S.C. §
9 1964(c), punitive damages, and injunctive relief to prevent further illegal activities
10 by Defendants. Plaintiff seeks compensatory damages, punitive damages, and any
11 other relief the Court deems appropriate under the CFAA, including damages for
12 financial losses, reputational harm, and the adverse impact on his business
13 operations. Plaintiff seeks compensatory damages, injunctive relief, foreseeable
14 attorneys' fees, and costs, as well as any other relief deemed appropriate by the
15 Court, pursuant to California Penal Code § 502(e). Plaintiff seeks compensatory
16 damages, punitive damages, and injunctive relief to prevent further extortion
17 attempts by Defendants. Plaintiff seeks compensatory damages, presumed damages
18 for defamation per se, punitive damages to punish Defendants for their malicious
19 conduct, and any other relief the Court deems just and proper. Plaintiff seeks an
20 award of reasonable, foreseeable attorneys' fees and costs, as provided by law,
21 including under 18 U.S.C. § 1964(c) and other applicable statutes. Plaintiff seeks
22 injunctive relief enjoining Defendants from continuing their unlawful conduct,
23 including the publication and dissemination of defamatory content about
24 ZELOCCHI, and further enjoining Defendants from pursuing frivolous lawsuits
25 against ZELOCCHI, or, in the alternative, for an order dismissing such lawsuits
26 with prejudice. Plaintiff seeks equitable relief, requiring Defendants to return stolen

1 property belonging to DAVID DO, or, in the alternative, to compensate
2 ZELOCCHI for the financial losses incurred in covering DAVID DO's losses.
3 Plaintiff also seeks any other relief the Court deems just and proper.

4 **F. Status of Discovery**

5 None of the named defendants have responded to the complaint as of this
6 date. Therefore, no discovery has been conducted.

7 Plaintiff anticipates seeking written discovery, including interrogatories,
8 document requests, and requests for admission as to all defendants. Plaintiff
9 anticipates that the need for further discovery may be identified during the course
10 of discovery.

11 **G. Procedural History of Case**

12 Plaintiff filed the within action on November 6, 2024, in propria persona.
13 Defendants Katy Diann Woody, Paramount Investigative Services and Kenneth
14 Childs have been served with the Complaint and Proofs of Service filed with the
15 Court. Plaintiff attempted service of the Summons and Complaint on Defendants
16 Adam Iza, Michael Quintenero and Christopher Quintenero, however, was
17 unsuccessful. Declarations of Diligence have been filed with the Court.

18 On February 17, 2025, attorney Marc Lazo substituted in as counsel for
19 Plaintiff Enzo Zelocchi. This court granted Plaintiff's Request to Substitute
20 attorney Marc Lazo for Plaintiff Enzo Zelocchi on February 25, 2025.

21 Plaintiff is currently in the process of hiring a private investigator to locate
22 and serve all Defendants who have not been served with the Complaint.

23 Plaintiff intends on filing Defaults against Defendants Katy Diann Woody,
24 Paramount Investigative Services and Kenneth Childs for their failure to respond
25 to the Complaint.

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1 **H. Requested Modifications of Deadlines**

2 Plaintiff does not request any modification of any deadlines.

3 **I. Consent to Magistrate Judge**

4 Plaintiff ENZO ZELOCCHI does not consent to a magistrate judge for trial.

5 **J. Need for Case Management Conference**

6 There is no immediate need for a Case Management Conference as none of
7 the other parties have responded as of this date.

8 **K. Immediate Relief Sought regarding Case Schedule**

9 There is no immediate relief sought regarding the case schedule.

10 Dated: March 18, 2025 K&L LAW GROUP, P.C.

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14 Marc Lazo
15 Attorney for Plaintiff